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August 6, 2001

BY HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
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Washington, DC 20554

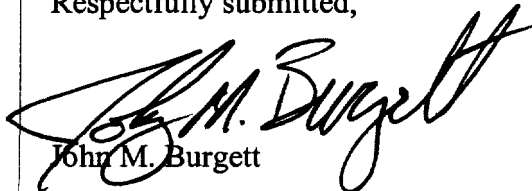
Re: Amendment of Section 73.622(b)
Table of Allotments
Digital Television Broadcast Stations
(Charleston, South Carolina)
MM Docket No. 01-128
RM-10133

Dear Ms. Salas:

Submitted herewith, on behalf of WCSC, Inc., the petitioner in the above-referenced proceeding, are an original and four copies of its comments in support of the Notice of Proposed Rule Making in the above-referenced proceeding.

If there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,


John M. Burgett

Enclosures

cc: All Parties on Certificate of Service

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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AUG 6 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)	
)	
Amendment of Section 73.622(b),)	MM Docket No. 01-128
Table of Allotments,)	RM - 10133
Digital Television Broadcast Stations.)	
(Charleston, South Carolina))	

To: Chief, Video Services Division

**COMMENTS OF WCSC, INC.
IN SUPPORT OF RULE MAKING**

WCSC, Inc. ("WCSC"), by its attorneys and pursuant to Section 1.420 of the Commission's rules,¹ hereby submits its comments in support of the Notice of Proposed Rule Making proposing to amend the Table of Allotments for the digital television ("DTV") service to change the initial DTV channel allotment for station WCSC-DT, Charleston, South Carolina, from Channel 52 to Channel 47.² WCSC is the licensee of WCSC-TV, Charleston, South Carolina, and the petitioner herein.

WCSC-TV currently operates on NTSC Channel 5. The station has been allotted DTV Channel 52 for its digital operations. In its Petition for Rule Making dated May 1, 2000 (the "Petition"), which is hereby incorporated by reference into these Comments, WCSC proposed changing its initial DTV channel allotment to Channel 47 so as to (1) allow WCSC-DT to

¹ See 47 C.F.R. § 1.420

² See *Notice of Proposed Rule Making*, MM Docket No. 01-128, RM-10133 (rel. Jun. 25, 2001).

commence operations on a core channel and (2) facilitate WCSC-DT's collocation and usage of a shared antenna with a second DTV station in Charleston.

Allowing WCSC-DT to operate on DTV Channel 47 would be far more efficient than having the station commence operation on DTV Channel 52, a non-core channel, and then moving to a core channel in the future. The allotment of Channel 47 to Charleston also would facilitate the use of a common antenna by WCSC-DT and collocated noncommercial educational station WITV-DT, DTV Channel 49, Charleston, South Carolina. The Petition and accompanying engineering statement demonstrate that the proposed allotment would be in compliance with the Commission's principal community coverage requirements.³ Moreover, the Petition demonstrates that WCSC-DT's proposed channel change will not result in any unacceptable interference to any other authorized DTV broadcast station, DTV allotment or analog television station pursuant to Section 73.623(c)(2) of the Commission's rules.⁴ Accordingly, WCSC submits that the substitution of DTV Channel 47 for DTV Channel 52 at Charleston is a preferable use of the digital television spectrum and therefore should be authorized.

WCSC hereby affirms its continuing interest in the allotment of DTV Channel 47 at Charleston, South Carolina. WCSC restates its intention to apply for DTV Channel 47 at Charleston, if it is allotted and, if authorized, to build a DTV facility on that channel promptly.

³ See 47 C.F.R. § 73.625(a).

⁴ See 47 C.F.R. § 73.623(c)(2).

For the reasons set forth above, WCSC strongly supports the Commission's proposal to amend the DTV Table of Allotments to allot and assign DTV Channel 47 (in lieu of Channel 52) to Charleston, South Carolina, for use by WCSC-DT.

Respectfully submitted,

WCSC, INC.

By: 

James R. Bayes
Gregory L. Masters
John M. Burgett

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Its Attorneys

August 6, 2001

CERTIFICATE OF SERVICE

I, Wendy Marcus, a secretary in the law firm of Wiley Rein & Fielding LLP, hereby certify that on this 6th day of August, 2001, I caused copies of the Comments of WCSC, Inc., In Support of Rule Making to be mailed via first-class, postage prepaid mail to the following:

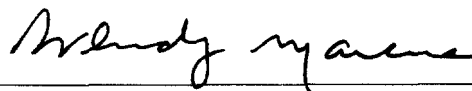
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